

from the Complainant and Cross-Respondent.

FOURTH: That further answering, your Cross-Complainant avers that to order a partition and sale of the aforesaid property would be violative of the oral agreement executed by the parties, and would result in immediate and substantial harm and detriment to the Cross-Complainant and the minor children of the parties.

WHEREFORE, your Respondent and Cross-Complainant prays:


1. That this Honorable dismiss the Bill of Complaint for Sale in Lieu of Partition.

2. That this Honorable Court in the alternative, issue an injunction enjoining any sale in lieu of partition of the subject property and improvements until the youngest child of the parties hereto attains the age of eighteen (18).

3. That this Honorable Court make the parties account for all joint expenses paid by each party with said amounts to be adjusted at the time of distribution from the sale of the subject property, should said sale be ordered to occur.

4. And for such other and further relief as the nature of this cause may require.

AND, AS IN DUTY BOUND, ETC.

  
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